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**\*\*Admitted in MA, CT, & CA**

July 14, 2004

Special Assistant U.S. Attorney James Goodhines  
U.S. Attorney's Office  
1550 Main Street  
Springfield, MA 01103

RE: **USA vs. Robert Knowles**  
**Docket No. 04-30019-MAP**

Dear Attorney Goodhines:

I am requesting discovery on behalf of Robert Knowles in the above-entitled matter.

1. All search warrant affidavits, warrants and returns issued in these investigations, and in the related state investigations. Likewise, I am requesting the unsealing of these files.
2. A written list of the names, addresses and qualifications of all experts the government intends to call as witnesses at trial, including but not limited to law enforcement officers, together with all reports made by such experts or, if reports have not been made, a brief description of the opinion and subject matter to which each is to testify.
3. The defendant further requests all information to which he is entitled pursuant to 18 U.S.C. §3500 or Rule 26.2 of the Federal Rules of Criminal Procedure.
4. A copy of all Grand Jury minutes generated from the indictment of the defendant and co-defendants.
5. Copies of any written statements, and the substance of any oral statements, allegedly made by any co-defendants, or by any person who has been a co-

defendant in any way, which are in any way related to the subject matter of this case.

6. A list of all names and addresses of witnesses the Government intends to call at trial.
7. Notice pursuant to 404(b) of all other crimes, wrongs or acts intended to be used at trial including (a) the date, time and place of each crime, wrong, or act; (b) a description of each crime, wrong or act; (c) a list of any documents or other evidence upon which the Government intends to rely to prove each such crime, wrong, or act; and (d) the "special grounds" including the special relevance and probative value for such evidence.
8. The full record of arrests and convictions of any government witness including whether this witness is currently under investigation for any violations of state or federal law.
9. Any promises, rewards and or inducements of any kind including whether or not the Government has requested or authorized the payment of any sums of money any informant or cooperating witness who has agreed to testify for the Government.
10. The record of any law enforcement agency, federal, state or local, which pertain to the criminal activity, arrest and/or conviction of any and all witnesses whom the government intends to call in this case.
11. The defendant requests that the Government preserve for trial any original notes taken by any of its investigating law enforcement and/or ATF agents of any interviews with persons who are or may be witnesses at trial and further requests that these notes be provided to counsel.
12. The defendant requests that the Government provide defense with all Jencks Act materials no less than ninety (90) days before jury selection in this case based on interests of judicial economy.

Thank you in advance for you cooperation. If you have any questions do not hesitate to contact my office.

Very Truly Yours,

  
Alan J. Black, Esq.